



July 14, 2022

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Honorable Andrew B. Altenburg, Jr. U.S.B.C.
United States Bankruptcy Court
401 Market Street
Camden, NJ 08101

**RE: Choates G. Contracting, LLC
Case No. 21-13085-ABA
Motion to Sell 122 Danton Lane - Returnable July 19,
2022**

Dear Judge Altenburg,

I am in receipt of correspondence from your law clerk which brought to my attention the fact that Turn-Key Management, Inc. and their attorney were not on the service list for the Debtor's motion to sell real estate.

It was my intention to serve Turn-Key and their attorney, and indeed I had prepared a supplemental service list which included Turn-Key Management and their attorney of record. Unfortunately, due to an internal miscommunication with my paralegal, the supplemental service list was not incorporated into the service list. Ultimately Turn-Key Management and their attorney were not on the service list prepared and filed by my paralegal, who also served the motion. I have taken steps to ensure such miscommunications will not occur in the future.

Given the fact that Turn-Key Management was not served with the moving papers, it would appear improper to affect their lien due to a lack of due process. Accordingly, I will be submitting

to chambers a revised proposed order that revises the applicable with the new language set forth below:

9. This sale shall be free and clear of the docketed judgment liens of the following creditors :

Creditor	Judgment Number	Date Docketed
Philly Properties GP, LLC	DJ-022480-2021	March 22, 2021

10. However, nothing in this order shall disturb the below lien, and the sale is not free and clear of the below lien, as Turn-Key Management Corp. did not receive proper service of this motion:

Turn-Key Management Corp.	DJ-181541-2021	December 7, 2021
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11. This Order does not bar the Debtor from seeking further relief from this Court in order to sell the Real Property free and clear from the docketed judgment lien of Turn-Key Management Corp.

It is then my intention to file a separate motion in order to address the lien of Turn-Key Management Corp., as well as a separate lien against the property which has been revealed in the buyer's title search.

If this correspondence and revised proposed order addresses your concerns, kindly advise me if an appearance will still be required on July 19, 2022. Otherwise, I will assume an appearance is required at that time.

Thank you for your courtesies,

Very truly yours,

/s/ Daniel Reinganum

Daniel Reinganum